

September 14, 2011

Illinois Power Agency
C/O Julie Mussleman Oost
joost@KelleyDrye.com

RE: Comments on 2012 IPA Draft Power Procurement Plan

To Whom It May Concern:

Thank you for providing the opportunity to submit comments on the 2012 Draft Procurement Plan (the "Draft Plan"). Please accept these comments on behalf of SoCore Energy.

SoCore Energy LLC is a commercial rooftop solar energy developer based in Chicago, IL. We work with commercial customers nationwide to provide distributed, rooftop PV solutions; these customers benefit from hedging their electricity costs while the broader electrical grid benefits from reduced strain on demand and distribution.

The Renewable Portfolio Standard in Illinois is one of the most aggressive standards in the United States. If fully and strategically implemented, this policy could be an engine for job growth and economic development in Illinois. SoCore would like nothing more than to assist in the proliferation of solar in its own backyard and to be a reason for dramatic job growth here in Illinois. However, in the past three years we have completed only 6 projects in Illinois representing **less than 10%** of our total business. The procurement of Solar Renewable Energy Credits (SRECs) in the upcoming (and future) IPA procurement has the opportunity to ensure that Illinois benefits from the jobs created from the local installation of solar power projects and that the electric grid receives the benefits of distributed solar.

As currently proposed, the Draft Plan puts solar energy, especially distributed solar energy, at a significant disadvantage.

First, the Draft Plan as currently outlined is tailored for large utility scale projects. Bidding requirements, fees, and timelines are often too onerous for distributed solar projects to economically complete. The dearth of DG solar bids will have to be filled with projects that are larger, riskier, having longer construction timelines, and fewer benefits to the grid and to the local economy.

Second, SoCore believes that future benchmarking of SREC prices should be a transparent process. The value of SRECs is driven by a vast number of factors including power prices, irradiance, sales tax, and especially solar RPS targets. The value of SRECs in Illinois will be higher than most mature SREC markets, and any attempt to set a ceiling for SRECs in Illinois based on other markets will be detrimental to the development of the solar market in Illinois.

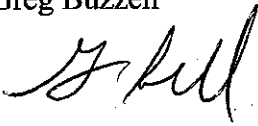
We respectfully recommend that the IPA modify the Draft Plan to:

1. Create a procurement program for SRECs from DG PV systems involving 10-year or longer contracts where pricing is fixed on an annual basis, rather than determined through an auction process
2. Undertake a transparent SREC benchmarking process accounting for the many differences across markets
3. Hold a series of workshops prior to the Spring 2012 procurement events to seek stakeholder input on program features and implementation procedures

Thank you for the opportunity to submit these comments. Please do not hesitate to contact me with any questions.

Sincerely,

Greg Buzzell



SoCore Energy